

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

**FILED**

OCT 24 2013

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

ANTONIO WILLIAMS

(Enter above the NAME of the  
plaintiff in this action.)

v.

1. Sheriff Jimmy Jones

2. Knox County Sheriff's Department

CONT ON PAGE 1A

(Enter above the NAME of each  
defendant in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ( ) NO (☒)
- B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_

Defendants: \_\_\_\_\_

3. capt. "John Doe" WILSHIRE
4. capt. "John Doe" ANDERSON
5. Lt. "John Doe" HARMAN
6. Sgt. Paul COOPER
7. Sgt. "John Doe" TRAVIS
8. correctional officer "John Doe" DOBBS
9. correctional officer "John Doe" RUTHERFORD
10. correctional officer "John Doe" WALLACE
12. Correctional officer "John Doe" EDD
13. nurse "JANE DOE" JONES
14. any other defendants to be determined during discovery

2. COURT: (If federal court, name the district; if state court, name the county):  
\_\_\_\_\_
3. DOCKET NUMBER: \_\_\_\_\_
4. Name of Judge to whom case was assigned: \_\_\_\_\_
5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit: \_\_\_\_\_
7. Approximate date of disposition: \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT: KANK COUNTY STREET'S DEPARTMENT

- A. Is there a prisoner grievance procedure in this institution? YES (☒) NO ( )
- B. Did you ☒ present the facts relating to your complaint in the prisoner grievance procedure? YES (☒) NO ( )
- C. If your answer is YES,
1. What steps did you take? SUBMITTED GRIEVANCES ON 10-21-13
2. What was the result? GRIEVANCES ARE STILL PENDING, CONT ON PAGE 2A
- D. If your answer to B is NO, explain why not. NA
- E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES ( ) NO ( )
- F. If your answer is YES,
1. What steps did you take? \_\_\_\_\_

C.

2. The Prisoner's Litigation Reform Act of 1996 P.L. 104-191 allows 90 days for a facility to respond to a grievance. Subsequently, in accordance with the Aforesaid; pg. 31 SEC. VI.F of Knox County Sheriff's Office inmate HANDBOOK clearly states that "a response to a Grievance will not exceed 90 days from receipt of the grievance." However, every time I request a response to the Grievances that I have filed in this matter, from the initial complaint filed on approx 0-22-13 to approx 20 Grievances I've submitted requesting a response to my complaint, I am told that the matter is still pending.

2. What was the result? \_\_\_\_\_

### III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Antonio Jonte Williams  
Present address: Knox County Sheriff's Department 300 Main Ave Knoxville, TN 37918  
Permanent home address: 525 Linden Ave Knoxville, TN 37914  
Address of nearest relative: 525 Linden RD Apt A 425 Knoxville TN 37919

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Sheriff Jimmy Jones Knox County Sheriff's Department  
Official position: (10) Sheriff, Knox County  
Place of employment: (11) City County Building, 400 Main Ave Knoxville TN 37902  
C. Additional defendants: CONF. PAGE 3A

### IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

1. At the time of the incident I had been in D  
placed in administrative segregation by the facility

2. Capt. "John Doe" Wilshire  
Facility commander, captain  
Knox County Sheriff Detention Facility  
5001 Mariettaville RD  
Knoxville, TN 37918

3. Capt. "John Doe" Anderson  
Facility commander, captain  
Knox County Sheriff Detention Facility  
5001 Mariettaville RD  
Knoxville, TN 37918

4. Lt. "John Doe" Herman  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Mariettaville RD  
Knoxville, TN 37918

5. Sgt. Paul Cooper  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Mariettaville RD  
Knoxville, TN 37918

6. Sgt. "John Doe" Travis  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Mariettaville RD  
Knoxville, TN 37918

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7. C/O "John Doe" Wallace  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Markersville RD  
Knoxville, TN 37918

8. C/O "John Doe" Rutledge  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Markersville RD  
Knoxville, TN 37918

9. C/O "John Doe" Dobbs  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Markersville RD  
Knoxville, TN 37918

10. C/O "John Doe" Kidd  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Markersville RD  
Knoxville, TN 37918

12. LPN "Jane Doe" Jones  
Nurse  
Knox County Sheriff Detention Facility  
5001 Markersville RD  
Knoxville, TN 37918

13. Any other defendants to be determined during discovery

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eg. Protective custody.

2. I was classified maximum security and being housed in Building 1 unit B which is a protective custody unit. At the time of the incident C/O DOBBS was the unit B officer.

3. C/O KIDD was the unit officer in unit 1-D unit 1-B and unit 1-D share the same recreation yard.

4. Facility policy requires that all maximum security inmates must wear wrist restraints anytime they are outside their cell.

5. On 6/19/13 at approx 12:30 pm C/O DOBBS placed me in restraints alone on the recreation yard for my hour rec time.

6. I walked over to the unit 1-D recreation door. I could hear C/O DOBBS on his radio calling over to unit 1-D and asking C/O KIDD if his recreation door was locked and C/O KIDD responded that his door was locked!

7. Approaching the door, I found it to be unlocked. I opened it and began yelling up to an inmate who was locked inside his cell on the second floor.



8. I have an extremely loud voice, so there's no doubt no hands are getting escaping since there's nobody outside these cells, and it was only two people in the day room.

9. Having concluded my conversation I closed unit D rec yard door and shut it to wake guard.

10. Approx 30 sec after I closed the door, it suddenly opened up and inmate dressed only in a tee shirt, boxers, socks shoes ran out on the rec yard and attack me in full force and began beating me punching, kicking me.

11. Not only did this inmate cut weigh me by at least 100 lbs - I am 20 yrs old 147 lbs. - but I was in wrist restraints and HE WASN'T!.

12. Unit D, in which this inmate was being housed, was a disciplinary unit requiring that every inmate wear restraints when outside their cells.

13. Furthermore, inmates housed in Building 2 must be dressed in their jumpsuits any time they are outside their cell.

14. Building 2 is a maximum security building consisting of 4 units, A, B, C, and D, with unit "D" being a disciplinary unit. This makes Building 2 unit D the most secured unit of the facility.

15. Additionally, I have been placed on Administrative

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for the purpose of me not being attacked by any inmate.

16. It was impossible for this inmate to have gotten out of his cell out of dress code all the way to the rec yard without C/O KIDD's help.

17. I've never been in more fear. That was the most terrible day of my life. I was in hand cuffs he wasn't while C/O KIDD watched.

18. C/O KIDD is approx 6'2", 300lbs and would of had no problem breaking this up. To know I was being beat, kicked, punched, while KIDD watched left me no doubt I would be beat to death.

19. This inmate kicked me punched me and stomped me on my head. I blacked out then came back in to only realize it was still in motion.

20. I was picked up and stomped on my head and back approx times, each time worse than the last. I lost both strength to resist, and balance, with C/O KIDD standing there watching.

21. For all I know, CO JOBBES WAS ALSO WATCHING IT ALL through the unit rec window and that he was allowing this to happen also. AS MY UNIT OFFICER I HAD NO reason to believe that he was not watching me since it was his job to do so!

22. I have never felt as much pain nor have I been so lost and confused as I was while being beaten that day. It seemed to go on and on but in reality it seem like 2 mins

23. I WAS ABOUT TO PASS OUT AGAIN WHEN I HEARD C/O KIDD TELL'S inmate, "that was enough" "That the fight" was over; for him to return to his cell? I couldn't believe he had allowed this inmate to beat me and was now instructing him to return to his cell as though he had been the victim!

24. It was only after C/O KIDD had given this inmate time to return to his cell, DID he finally get on his radio and called for help!

25. I WAS extremely dizzy and don't remember every one who responded but I do recall C/O HIGGINS, SGT COOPER, C/O WALLACE AND C/O RUTHERFORD. I heard C/O KIDD yelling, "He is on the VOLT!"

26. I expected some kind of help instead I was attacked again for no reason, this time by C/O WALLACE C/O RUTHERFORD I WAS STAMED then they started to kick me, kicking the wind out of me again when I WAS ALREADY IN PAIN.

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27. I watched as what appeared to be no less than 20 officers pour out on the rec yard - I have no idea what exactly they were responding to cause there was no fight and the inmate who attempted to kill me had been escorted back to his cell by C/O KIDD who had let him out to get me in the first place before he had made the call for help.

28. With Lt Herman clearly in charge and as a victim of a serious and almost fatal attack, my face and arms bleeding from numerous cuts and abrasions from this self-inflicted attempt to kill me by no means less than a inmate "hit man", I was thrown to the concrete by numerous officers, all charged up for what appeared to be a response to a fight?

29. even though the obvious evidence - me on the ground bleeding and alone and 20 restraints - clearly demonstrated that that something else was going on. I was treated as though I had been the aggressor. With Lt Herman's instructions, the restraints were removed from my wrist. I was rolled to my stomach and for absolutely no reason what so ever I was cuffed with my hands behind my back by C/O WILLIAMS + CUBBERG.

30. Every chance they get, they stomped their fists and knee into my back side and head.

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31. I cried out and begged them to please stop that I hadn't done anything nor was I attempting to do anything other than to see some type of medical attention.

32. my pleas for help was ignored. I'm yelling my chest hurt that my head in my back hurt But rudthorford holding my cuffs slams me into the ground with his knee in my back just as if I assault someone.

33. I kept begging over and over for them to stop but C/O WALLACE and rudthorford dragged me back into unit B where I was then slammed against the wall, even though I was all ready hand cuffed and barely even conscious C/O rudthorford slams me into the wall for absolutely no reason at all. While Lt hamman and numerous others looking on I was already bleeding bad from the last attack.

34. I was dragged into my cell by Lt hamman and rudthorford, where I was thrown on the bunk with Lt hamman holding me down. I'm still cuffed rudthorford shut the door across my face saying I deserved this.

35. In approx April of 2013 while housed in Building I, unit B, they had a major shake down, involving numerous correctional officers and E-9's. C/O Rudthorford was one of the officers involved and being a typical teenager that I was, I began calling Rudthorford names through my cell door, just shouting off.

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36 In an attempt at getting even with me for the remarks that I made, C/O Rutherford Slapped me and beat me continuously about the face and head over and over until he finally got tired, with Lt. Harman holding me down. Lt. Harman never hit me while I was in the cell, but he never stopped C/O Rutherford from hitting me.

37 I experienced intense head pain, every punch and slap to my head by C/O Rutherford felt like he was using a ball bat. I had tears in my eyes as I pleaded with him to please stop. My eyes were blurry and I began blinking in and out, barely able to remain focus. I felt like a rag doll.

38 More than anything I feared for my life. I was being beat by a correctional officer with no witness which meant they could do anything they wanted to me. C/O Rutherford repeated how much I deserved the beating that he was giving me. I passed out twice during this assault. Lt. Harman finally removed the restraints and locked me in the cell.

39 Every part of my body hurt, with most of the pain being in my head, lower back and chest. Approx 5 mins after Lt. Harman and Rutherford left the cell, the unit officer JONES appeared at the door. I was in tears as I asked him why had this been allowed to happen to me? C/O JONES said that it was all C/O KIDD doing. He had nothing to do with it.

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40. I ASKED C/O DOBBS if he would send me to the clinic, which was a small exam room located in one building. (main clinic is in Building 6.) He said I couldn't right now, the nurse was seeing the inmate that attacked me!!

41. This inmate who beat me up while I was in wrist restraints and weighing at least 100 lbs were then me and not a single injury that I caused, was being examined by the nurse while I sat bleeding in my cell!!

42. Approx 20 mins later nurse Jones arrives with C/O Rutherford. I was covered in my blood, bleeding from numerous cuts and abrasions. I complained of intense head and back pain without so much as examination she said to wash the cuts with soap and water that my injury was not bad. C/O Rutherford said to me "he is okay!!". I asked, are you serious? you not going to check me out or nothing? she reported that I would be okay, and they left.

43. I immediately wrote a letter to the Building Supervisor, Sgt Paul Cooper and gave it to C/O DOBBS complaining of pain in my head, neck, back and chest. I asked if they would please take me to the hospital. That I was hurt and I needed help. This was approx 1 PM.

44. Approx 3 hours later, after shift change, approx 3:30 PM I was called out to Building 1 clinic by nurse Jones after I repeatedly complained about head pain. I was subsequently examined by nurse Jones who then instructed Sgt Cooper to take photos of my injuries. approx 10 photos were taken.

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45 After a walk to the clinic in Building C to collect my medical records, I was placed in restraints and unconsciously dumped in the smallest compartment of a rear county van and taken to UT hospital. I could barely remain conscious as I was intentionally thrown from one side to another due to the way they were driven.

46 I arrived at UT Hospital at approx 4:30pm. I was examined by a ER doctor, received a full body X ray and a CT scan. I was given a shot. I was instructed to inform the facility if I continued to have head pains.

47 I was released from the hospital approx 5 hours later and returned to my cell. Although I was still covered in blood, I was not allowed to take a shower or wash the blood from me until 9-22-13 approx 2 days after almost being beaten to death.

48 I had knots and bumps and cuts all over my head which was even worse due to my short hair as my hands and arms were all cut up. I was in intense pain, every part of my body hurt, whether sitting, standing or lying down the pain was constant all around. For pain meds was denied.

49 I discovered that the inmate who attacked me was not only examined before me, he was given 45 days in prison segregation for trying to beat me to death, (cont.)

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- the lowest amount of time allowable, when policy clearly states he was to receive no less than 60 days! ALSO as a reward for almost beating me to death, he received extra food each meal for everyday that he was in protective segregation for this assault. this clearly demonstrates that the officer was Satisfied by staff members other than just C/O LIND, whose responsibility was to keep me secured and safe!

50. It was clear that this conspiracy began back in Feb 2013 when out to punish me, staff members falsified dietary records placing me on a "finger food diet" where I unknowingly remained for over four months

51. In approx July or Aug 2015, I confabulated SGT LEMIS and the physc doctor, MIKE POWERS about why I had been placed on finger food. MIKE POWERS was the only person who could authorize such a diet, since people on this type of diet are almost always suffering with suicide issues

52. To my surprise, I was informed that I had never been placed on a finger food diet. There had never been such instructions or orders issued nor was there any such data in the computer. Correction officers in Building 2 had conspired together to falsify medical records and since this order never came from the kitchen, staff members had to tamper with my food the entire time.

53. Receiving a paper food diet for four months is a means of physical punishment, by denying me a regular diet was nothing short of being cruel and unusual punishment.

54. My disciplinary record clearly shows that some time after I was indicted of a felony charge while awaiting another court date I developed a juvenile attitude problem and stated out exactly what was on my mind which certainly upset staff members

55. However, one would assume that correctional officers would have a tougher skin as to listen the comments from a frustrated teenager to cause them to violate my protection under the United States Constitution.

56. On approx 6/22/13 approx 2 weeks after the incident I submitted a grievance describing everything that had happen to me during the 6-19-13 incident. I describe what the inmate had done and how the staff member were allowed to beat me while a senior staff member a Building supervisor and facility supervisor looked on and assisted. How medical refused to treat me until I made a urgent written request through a Building supervisor.

57. Since my initial Grievance, I've submitted no less than 20 Grievances from not receiving adequate medical attention to the facilities failure to respond to my initial Grievance concerning this incident even though it's over 90 days

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58 Housing location and disciplinary records unequivocally demonstrate that this facility has caused me as much physical pain and discomfort as they can get away with, while denying me adequate medical attention, even though I've continually complained about head, neck, and back pain. I've not had a single MRI nor a follow up CT scan nor have I been examined by a chiropractor. When my head and back pain becomes so intense and my complaints seem to them to be more urgent, they simply check my vital signs nothing more.

59. I continue to suffer from head, neck and back pain. I'm extremely fearful of being around a group of officers, especially those officers who beat and attempt to kill me. I suffer with constant recurring night mares where I am being beaten to death by that inmate or by numerous correctional officers. I'm even louder than I was before as I attempt to hide my fear by acting tough.

60. I always assume that given the chance, a low level correctional officer would have no problem punching a inmate a few times. However, to have experienced an assist facility commander physically participate in a savage assault on my person clearly shows that I can be killed by either an inmate or an officer at this facility.

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C11. There are ceiling mounted security cameras that capture the incident on 9-19-13. Staff members sympathetic to what happened have told me that the video is crucial and unbelievable, that they never seen anything like this. Aside from this attack by this inmate, and the assault by correctional officers in the rec yard various Building 3 security cameras would have captured the following:

- A. C/O KIDD releasing a inmate improperly dressed from his cell without wrist-restraints and permitting him to enter the rec yard and
- B. C/O KIDD allowing inmate to return to his cell before calling back up.
- C. ME BEING physically assaulted inside the day room while I was in wrist restraints
- D. Although it does not capture what happen in my room it shows the amount of time they were inside my cell.
- E. the aggressor being seen before me
- F. Staff members congratulating him for almost beating me to death.
- G. Exactly what correctional officers were standing watching both the excessive force on the rec yard and in my cell by Lt. Harman C/O Rutherford and C/O Wirtz.
- H. VIDEO shows how many times I played basketball in the rec yard minutes leaving my cell to get cigarettes in the rec for me about this incident.

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## V. RELIEF

Stating a claim;

1) Defendant "John DOE" KIDD

2) Defendant "John DOE" DOBBS

A. K.C.S.D. policy requires that unit unit officers insure that the connecting unit's recreation yard door is locked prior to releasing any inmate to the rec yard. This clearly wasn't done by either officer. Unit officer's primary function would be to insure inmates remain in custody and that they remain safe. Large glass windows allow for a clear unrestricted view of the rec yard from the unit officers desk which made it impossible for C/O DOBBS not to have noticed this inmate attacking me on the yard. Additionally, C/O DOBBS stood at my cell door and watched as I was held down in restraints and beaten by C/O Ruffner.

For the purpose of stating a claim both Defendants KIDD and DOBBS ARE GUILTY of no less than a failure to protect, in violation of the 8<sup>th</sup> Amendment to the United States Constitution.

B. I had been placed on administrative segregation; housed in a protective unit, in wrist restraints on a rec yard connected to a punitive segregation unit in a maximum security building. This made it impossible to have gotten out of his cell, improperly crossed and to the rec yard without C/O KIDD help

(For this inmate)

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— and allowed for this attempt on my life by a inmate under his control and instructions does for the purpose of a stating a claim, would demonstrate no less than excessive force, a clear violation of the 14<sup>th</sup> amendment to the United States Constitution.

C. Defendant "John Doe" Kidd and Defendant "John Doe" "DOBBS" ARE BEING SUED in their official and their individual capacity for both compensatory and punitive damages in the amount of 10 million DOLLARS.

3. Defendant "John Doe" Harmon

4. Defendant "John Doe" Rutherford

5. Defendant "John Doe" Wallace

A. Lt. Harmon holds the rank of a asset facility commander who first stood by while I was beaten on the yard by correctional officers and later assisted to Rutherford in beating me continuously after dragging me into my cell. C/O Rutherford and C/O Wallace took every chance they got to abuse me in the rec yard and later inside the pod. C/O Wallace tried his best to break my wrist. C/O Rutherford took his time to "learn" beat me, specifically directing his blows to cause the most pain. I was in a cell sitting on a bunk with my hands cuffed behind me back while Lt. Harmon help me as C/O Rutherford beat me, slapped and pushed me as hard as he could.

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B. For the purpose of stating a claim, Defendant Harmin, Rutherford and Wallace are guilty of no less than a failure to protect, excessive force and a denial of due process law in direct violation to the 8th and 14th Amendments to the United States Constitution.

C. Defendants "John Doe" Harmin, "John Doe" Rutherford and "John Doe" Wallace are being sued in their official and their individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

(1) Defendant Paul Cooper

A. AS A BUILDING SUPERVISOR holding the rank of a Sgt he first stood by and watched as correctional officers assaulted me for no reason other than the fact that they were exceptionally although he could see the injuries I incurred during the attack he denied me immediate medical care waiting almost 3 hrs before I was finally seen. AS A BUILDING SUPERVISOR, he had the authority to order that I be examined immediately, or certainly before the officers were examined.

B. For the purpose of stating a claim, Defendant Paul Cooper is guilty of no less than a failure to protect and a denial of medical care in violation of the 8th and 14th Amendment to the United States Constitution.

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C. Defendant PAUL COOPER is being sued in both his official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

7) Defendant "John Doe" TRAVIS

A) At the time of the incident was the assist Building 1 supervisor, holding the rank of a Cpl, like SGT COOPER who could have ordered that I be examined by the nurse. Both he and SGT COOPER allowed for the aggressor who suffered no physical injuries from his violent attack on me, to be examined before me while I was refused.

B. For the purpose of stating a claim defendant "John Doe" TRAVIS is guilty of no less than the denial of medical care which is a constitutional violation.

C. Defendant "John Doe" TRAVIS is being sued in his official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

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8.) Defendant "Jane Doe" Jones

A. The Defendant knowingly refused to treat and or to immediately examine me, even though she was told numerous times that I had suffered a head injury and had been knocked unconscious no less than three times. Her instructions was that I wash the numerous cuts and abrasions with soap and water only rather than to treat me. This clearly shows a denial of medical care, especially with her being a nurse. If I would of never sent a letter to Sgt Cooper, I would have not went to the UT hospital or seen nurse Jones. Nurse Jones was examining the employee while I was bleeding in my cell for hours before I was examined by nurse Jones who finally instructed I go to the hospital.

B. For the purpose of stating a claim defendant "Jane Doe" is guilty of no less than a Denial of medical care which is a constitutional violation.

C. Defendants Jane Doe is being sued in her official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars

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9. Sheriff Jimmy Jones and/or

10. The Knox county Sheriff's Department facility

A. Defendant is the Knox county Sheriff and therefore responsible for the actions of those subordinates who work at the K.C.S.D.F. The policy regarding the operation of the K.C.S.D.F.

fall directly under his jurisdiction which would make him directly responsible. Since a facility is not a individual it would appear that for a purpose of a new suit, Sheriff Jimmy Jones must be considered the defendant in this matter.

B. For the purpose of stating a claim, and for the reason stated Jimmy Jones and/or the K.C.S.D.F. is guilty of excessive force, a failure to protect and a denial of medical care, violation of the United States Constitution.

C. Defendant Jimmy Jones and/or the K.C.S.D.F. is being sued in their official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

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11. Defendant Capt. "John Doe" Wilshire

12. Defendant Capt. "John Doe" Anderson

A. Both these defendants share the duty of being the facility commander and therefore are directly responsible for what happened. They both had to know about this incident either directly or by radio. However they made no attempt to defuse the situation or insure that I was kept safe for injury. However officers responded, Sgt, Cpl, LT in what should have been the most secure building, which demands the facility commanders know immediately. They failed in their duty to correct the situation especially when they had direct access to real time video of the incident, and what took place in the pod after workouts.

B. For the purpose of stating a claim, and for reasons stated both defendant "John Doe" Wilshire and defendant "John Doe" Anderson are guilty of no less than a failure to protect and a denial of medical care.

C. Defendants John Doe Wilshire and Anderson are being sued on their official or individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

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Evidence clearly shows that there was a joint effort. The tape shows the whole incident that almost cost me my life. I'm still dealing with issues from it. Numerous officers took place in violating my rights under the U.S. Constitution, which none of this would of been possible without the officers working together. For a minute to be released from his cell without the proper dress code or hand cuffs while I had cuffs on and security watching me, to a senior officer assisting a C/O beat me unconscious in a cell to me being denied medical attention for almost three hours after the incident. Then the person that attacked me gets treated first. I sat in my cell bleeding for hours. This clearly shows a conspiracy. This is all on tape. I ask for a stamped filed copy of this complaint.

I (we) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 21<sup>st</sup> day of Oct, 2013

Antoneo Williams  
Signature of Plaintiff

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